

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

William Riley-El,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15 CV 11180
)	
Salvador Godinez, et al.,)	Honorable Judge John Z. Lee
)	
Defendants.)	Magistrate Judge Young B. Kim

NOTICE TO PRO SE LITIGANT
OPPOSING MOTION FOR SUMMARY JUDGMENT

The defendants have moved for summary judgment against you. This means that the defendants are telling the judge that there is no disagreement about the important facts of the case. The defendants are also claiming that there is no need for a trial of your case and are asking the judge to decide that the defendants should win the case based on their written argument about what the law is.

In order to defeat the defendants' request, you need to do one of two things: you need to show that there is a dispute about important facts and a trial is needed to decide what the actual facts are or you need to explain why the defendants are wrong about what the law is.

Your response must comply with Rule 56(e) of the Federal Rules of Civil Procedure and Local Rule 56.1 of this court. These rules are available at any law library. Your Rule 56.1 statement needs to have numbered paragraphs responding to each paragraph in the defendant's statement of facts. If you disagree with any fact offered by the defendants, you need to explain how and why you disagree with the defendants. You also need to explain how the documents or declarations that you are submitting support your version of the facts. If you think that some of

the facts offered by the defendants are immaterial or irrelevant, you need to explain why you believe that those facts should not be considered.

In your response, you must also describe and include copies of documents which show why you disagree with the defendants about the facts of the case. You may rely upon your own declaration or the declarations of other witnesses. A declaration is a signed statement by a witness. The declaration must end with the following phrase: “I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct,” and must be dated. If you do not provide the Court with evidence that shows that there is a dispute about the facts, the judge will be required to assume that the defendants’ factual contentions are true, and, if the defendants are also correct about the law, your case will be dismissed.

If you choose to do so, you may offer the Court a list of facts that you believe are in dispute and require a trial to decide. Your list of disputed facts should be supported by your documents or declarations. It is important that you comply fully with these rules and respond to each fact offered by the defendants, and explain how your documents or declarations support your position. If you do not do so, the judge will be forced to assume that you do not dispute the facts which you have not responded to.

Finally, you should explain why you think the defendants are wrong about what the law is.

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

/s/ Colleen M. Shannon
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2019, the foregoing document was electronically filed through the Court's CM/ECF system, and a copy was served on Plaintiff at the address below via U.S. mail.

William Riley-El #B-03069
Stateville Correctional Center
P.O. Box 112
Joliet, Illinois 60434

/s/ Colleen M. Shannon